UNITED STATES BANKRUPTCY	<b>COURT</b>
DISTRICT OF NEW JERSEY	

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Proposed Counsel to the Debtor

and Debtor in Possession

In re:

ALUMINUM SHAPES, L.L.C.,

Debtor.

Chapter 11

Case No. 21-\_\_\_\_\_- - ( )

## APPLICATION FOR ADMISSION PRO HAC VICE

Edmond M. George, Esq. ("Movant"), a member in good standing of the Bar of the State of New Jersey and an attorney admitted to practice before the United States District Court for the District of New Jersey, and a partner with Obermayer Rebmann Maxwell & Hippel LLP, hereby moves the Court for an order permitting Michael D. Vagnoni, Esq. to practice *pro hac vice* before the United States Bankruptcy Court for the District of New Jersey to represent Debtor, Aluminum Shapes, L.L.C. in the instant matter pursuant to Local Bankruptcy Rule 9010-1. In support of the relief requested herein, Movant states as follows:

## **JURISDICTION**

This Court has jurisdiction to consider this application pursuant to 28 U.S.C. §§ 157 and 1334. Consideration of this application is a core proceeding pursuant to 28 U.S.C. §157(b). Venue of this proceeding in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

## RELIEF REQUESTED

By this application, the Movant requests entry of an Order admitting *pro hac vice*, Michael D. Vagnoni, Esq. (the "Applicant"). The good standing of the Applicant is set forth in the Applicant's certification which is submitted herewith (the "Certification").

Applicant is a partner at Obermayer Rebmann Maxwell & Hippel LLP with an office at Centre Square West, 1500 Market Street, Suite 3400, Philadelphia, PA 19102. As the Certification demonstrates, Applicant is a member in good standing of the Bar of the highest court in which he is admitted.

It is anticipated that Applicant will be active in the representation of the Debtor in this case. Accordingly, the Movant respectfully requests that the Court grant the *pro hac vice* admission of Michael D. Vagnoni, Esq. and that he be permitted to appear on Aluminum Shapes, L.L.C.'s behalf in connection with this case.

No previous application for the relief sought herein has been made to this or any other court in connection with this proceeding.

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## WAIVER OF MEMORANDUM OF LAW

Pursuant to Local Rule 9013-1, Movant respectfully requests that the Court waive the requirement that it file a memorandum of law in support of this Application. Movant respectfully submits that no memorandum of law is necessary because no novel issues of law are presented herein.

Respectfully submitted,

Dated: August 15, 2021 By: /s/ Edmond M. George

Edmond M. George, Esquire Turner N. Falk, Esquire

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